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March 29, 2023

**VIA ECF**

United States District Court

Southern District of New York

Attn: Hon. Lorna G. Schofield, U.S.D.J. **Dated: March 30, 2023**  
40 Foley Square, Courtroom 1106 **New York, New York**  
New York, NY 10007-1312

Application GRANTED nunc pro tunc. The parties shall file the materials below by **March 30, 2023**.



LORNA G. SCHOFIELD  
UNITED STATES DISTRICT JUDGE

**Re: Edelman v. NYU Langone Health System, et al.**  
**Case No.: 1:21-cv-502 (LGS) (GWG)**  
**MLLG File No.: 209-2020**

Dear Judge Schofield:

This firm represents the Plaintiff, Dr. Sari Edelman (hereinafter “Plaintiff” or “Dr. Edelman”), in the above-referenced case. Plaintiff writes, with the consent of Defendants, to respectfully seek a one (1) day extension, until Thursday, March 30, 2023, of the parties’ deadline to submit the parties’ joint requests to charge, *voir dire*, verdict form, and any memorandum of law.

Pursuant to this Court’s September 20, 2022 Order and March 28, 2023 (the “Orders”), see Docket Entries 156 and 188, the parties’ deadline to submit the aforementioned documents is today, March 29, 2023.

Pursuant to ¶ I(B)(2) of this Court’s Individual Rules and Civil Procedures, there has been one (1) previous request for an extension of this specific deadline. The reason for the request is that the parties will be exchanging their respective drafts of the foregoing submissions this evening and will meet and confer concerning same tomorrow. In addition, among other deadlines and appearances, Plaintiff’s counsel was before the Hon. Nancy Hershey Lord, U.S.B.J. on a telephonic status conference that went longer than anticipated, and your undersigned also had to deal with some child-care issues. As a result, the parties could not meet and confer concerning the submissions today.

It is respectfully submitted that the requested extension should not affect any of the Court’s other deadlines, although the parties respectfully reserve the right to seek an appropriate extension of time should the need arise.

Plaintiff therefore respectfully submits that there is good cause for granting the requested two (2) day extension. See Fed. R. Civ. P. 6(b)(1)(A).

Hon. Lorna G. Schofield, U.S.D.J.

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Accordingly, Plaintiff's consent letter motion for an extension of time to submit the aforementioned trial documents should be granted. Plaintiff thanks this Court for its time and attention to this case.

Dated: Lake Success, New York

March 29, 2023

Respectfully submitted,

**MILMAN LABUDA LAW GROUP PLLC**

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/s  
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cc: Defendants (via ECF).